

JOSEPH FERRARA

1 the 81 Precinct from April until your surgery let's say?

2 A. No.

3 Q. Did you ever discuss the troubles you had had as  
4 a result of the things you told us about with Steve  
5 Mauriello?

6 A. I might have.

7 Q. Do you have any recollection of it?

8 A. No.

9 Q. As one of the attorneys in this case responds in  
10 saying anything is possible, but I just want to know --

11 A. I might have.

12 Q. -- what it is you recall.

13 A. I might have.

14 Q. But you don't have any recollection?

15 A. No.

16 Q. So, you don't have any recollection of anything  
17 he might have said in response or anything of the sort?

18 A. No, I really don't.

19 Q. And you throughout your testimony were talking  
20 and referring to a couple of different types of conduct,  
21 official misconduct, misconduct or just generally  
22 inappropriate behavior.

23 You've told us that you thought, I think these  
24 were your words, that it was inappropriate for Mauriello to  
25 refer to Schoolcraft as a rat.

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1           Okay. Any other conduct that you can recall that  
2   Mauriello engaged in that you considered to be  
3   inappropriate conduct? I'm going to ask you then about  
4   misconduct and official misconduct.

5       A.     In regards to Schoolcraft or anything?

6       Q.     In regards to anything you observed on the job  
7   with him.

8       A.     No.

9       Q.     Any conduct that you recall that he engaged in  
10   that you consider to be a misconduct?

11      A.     No.

12      Q.     Any official misconduct that you believe he  
13   engaged in?

14      A.     No.

15      Q.     Did you have an opportunity to observe Adrian  
16   Schoolcraft on the job at any time?

17      A.     Yeah, on the TS operator position.

18      Q.     That would have been while you were on restricted  
19   duty after you were hurt and before your surgery?

20      A.     No, it would have been -- it could have been any  
21   time because as platoon commander you either go out or you  
22   stay in on the desk and he was a second platoon officer, so  
23   taking the desk as a third platoon lieutenant he might be  
24   sitting around for a few extra minutes until the third  
25   platoon TS operator comes out of roll call and gets

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1           Is that -- was there one -- more than two  
2     recordings that you had search through to find out if there  
3     was anything useful or has it always been that there were  
4     only two?

5       A.     No, there was two. What I was referring to by  
6     searching, those meetings were an hour and ten minutes  
7     each, I had to go through and listen to an hour and ten  
8     minutes worth to see if there was anything that pertained.

9       Q.     Okay. Were you -- your purpose in making the  
10    recordings was to record Mauriello saying something  
11    inappropriate about Schoolcraft you tell us, right?

12    A.     Yes.

13    Q.     And, so, when Norinsberg is asking you for  
14    information you don't recall at that time whether the  
15    recordings you made for the sole purpose of recording  
16    Mauriello saying inappropriate things about Schoolcraft  
17    contained such inappropriate things?

18    A.     I wasn't sure exactly what was said. I wasn't  
19    sure if he used the word rat. I don't -- I wasn't sure how  
20    he referred to Schoolcraft, so I had to go back and look  
21    just to see because, you know, there's -- there's multiple  
22    ways of referring to people and I just didn't want to say A  
23    and it was B, so I had to go back and review it.

24    Q.     Directing your attention to page 12144,  
25    Mr. Norinsberg writes to you on August 11, 2010. I would